

MICHAEL K. PORTER, OSB No. 211377  
Sr. Deputy City Attorney  
[mike.porter@portlandoregon.gov](mailto:mike.porter@portlandoregon.gov)  
Portland City Attorney's Office  
1221 SW 4th Ave., Rm. 430  
Portland, OR 97204  
Telephone: (503) 823-4047  
*Counsel for Defendant Tequila Thurman*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**JEREMIAH COOK**, an individual,

Plaintiff,

v.

**TEQUILA THURMAN** in her individual capacity, **CARRIE HUTCHISON** in her individual capacity, and **RYAN LUFKIN** in his individual capacity,

Defendants.

**Case No. 3:24-cv-01481-AB**

**DECLARATION OF MICHAEL K. PORTER**

**(In Support of Unopposed Motion for Extension of Deadlines)**

I, Michael K. Porter, Sr. Deputy City Attorney, declare as follows:

1. I have prepared this declaration in support of Unopposed Motion for Extension of Deadlines.

2. This motion is presented in good faith and not for reasons of delay.

3. Witnesses with information material to a claim or defense are in state custody.

The process to arrange for their deposition took longer than anticipated and their deposition may not be scheduled in time to comply with the current discovery deadline.

4. Furthermore, Plaintiff resides out of state, scheduling his deposition has also required setting dates outside the current discovery window.

5. These delays should not impact the trial date in this matter and attempts to avoid the delays proved unavailing.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: April 9, 2025

/s/ Michael K. Porter  
Michael K. Porter